

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re	:	Appeal from Chapter 11
	:	Case No. 15-11835 (SCC)
SABINE OIL & GAS CORPORATION, <i>et al.</i> ,	:	Jointly Administered
	:	
Debtors.	:	
	:	
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THE BANK OF NEW YORK MELLON TRUST	:	Docket No. 16-cv-06385-UA
COMPANY, N.A., as Trustee under the 2017	:	
Notes Indenture,	:	
	:	
Appellant,	:	
	:	
v.	:	
	:	
SABINE OIL & GAS CORPORATION, <i>et al.</i> ,	:	
	:	
Appellees.	:	
	:	
-----X		
WILMINGTON SAVINGS FUND SOCIETY	:	Docket No. 16-cv-06391-UA
FSB, as Indenture Trustee for the Forest Oil 7.25%	:	
Unsecured Notes due 2019,	:	
	:	
Appellant,	:	
	:	
v.	:	
	:	
SABINE OIL & GAS CORPORATION, <i>et al.</i> ,	:	
	:	
Appellees.	:	
	:	
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(caption continued on next page)

MOTION TO CONSOLIDATE

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DELAWARE TRUST COMPANY, as Indenture	:	Docket No. 16-cv-06420-UA
Trustee for the Forest Oil 7.5% Unsecured	:	
Notes due 2020,	:	
	:	
Appellant,	:	
	:	
v.	:	
	:	
SABINE OIL & GAS CORPORATION, <i>et al.</i> ,	:	
	:	
Appellees.	:	
	:	
-----X		

MOTION TO CONSOLIDATE

Pursuant to Rules 7 and 42 of the Federal Rules of Civil Procedure, The Bank of New York Mellon Trust Company, as Trustee under the 2017 Notes Indenture, Wilmington Savings Fund Society, FSB, as Indenture Trustee for the Forest Oil 7.25% Unsecured Notes due 2019, and Delaware Trust Company, as Indenture Trustee for the Forest Oil 7.5% Unsecured Notes due 2020 (collectively, the “Trustee Appellants”), through their undersigned counsel, hereby respectfully move for an order consolidating the three above-captioned cases (the “Trustee Appeals”) with each other and with case number 16-cv-6054-JGK, *Official Committee of Unsecured Creditors v. Sabine Oil & Gas Corp. (In re Sabine Oil & Gas Corp.)* (the “Committee Appeal”).

In support of their motion, the Trustee Appellants respectfully state as follows:

1. The Trustee Appeals and the Committee Appeal all arise from the same case in the bankruptcy court, *In re Sabine Oil & Gas Corp.* (No. 15-11835-SCC) (the “Bankruptcy Case”).
2. On May 2, 2016, the Debtors in the Bankruptcy Case (the “Debtors”) filed in the Bankruptcy Case a solicitation version of the *Second Amended Joint Chapter 11 Plan of Reorganization of Sabine Oil & Gas Corporation and Its Debtor Affiliates* (the “Plan”).

3. Thereafter, the Official Committee of Unsecured Creditors (the “Committee”) filed in the Bankruptcy Case an objection to the Plan.

4. Each of the Trustee Appellants joined in full the Committee’s objection to the Plan.

5. On July 27, 2016 (and as corrected on July 28, 2016), the bankruptcy court filed its *Findings of Fact, Conclusions of Law, and Order Confirming the Debtors’ Second Amended Joint Chapter 11 Plan of Reorganization* (the “Confirmation Order”), which confirmed the Plan.

6. The Committee and the Trustee Appellants each have separately filed notices of appeal from the Confirmation Order.

7. “When parties have separately filed timely notices of appeal” from the same order, “the district court . . . may join or consolidate the appeals.” Fed. R. Bankr. P. 8003(b)(2).

8. The Trustee Appellants intend to join in the arguments made by the Committee in the Committee Appeal.

WHEREFORE, the Trustee Appellants respectfully request that this Court consolidate the Trustee Appeals with one another and with the Committee Appeal, with the Committee Appeal as the lead case.

Dated: August 15, 2016
Washington, D.C.

Respectfully submitted,

/s/ Lawrence S. Robbins
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